

STATE OF INDIANA)
) SS
COUNTY OF LAKE)

IN THE LAKE CIRCUIT/SUPERIOR
COURT

1020 FOOD MARKET, INC., and)
MOHAMMAD ALZOUBI, Individually,)
)
Plaintiffs,)
)
v.) CAUSE NO.:
)
STARR INDEMNITY & LIABILITY,)
COMPANY,)
)
Defendant.)

COMPLAINT

Come Now, PlaintiffS, 1020 Food Market, Inc. and Mohammad Alzoubi, by counsel, William H. Walden, and for cause of action against Defendant, Starr Indemnity & Liability Company, states:

1. That at all times herein mentioned, Plaintiff, 1020 Food Market, Inc. (hereinafter "1020") was an Indiana corporation licensed to do business in the State of Indiana located at 1715 East Dunes Highway, Gary, Lake County, Indiana.

2. That at all times herein mentioned, Plaintiff, Muhammad Alzoubi, (hereinafter "Alzoubi") was an Indiana resident and the President of 1020.

3. That at all times herein mentioned Starr Indemnity & Liability Company (hereinafter "Starr") was a Texas corporation doing business in the State of Indiana and was at all times engaged in the business of providing business property insurance coverage.

4. That at all times herein mentioned there was in full force and effect a Business Property policy of insurance issued by Starr under Policy No. 1000381140181 providing personal property

protection in the amount of \$120,000.00 Replacement Cost. A copy of said policy is not available.

4. That on or about June 17, 2018, 1020's business property was totally destroyed by fire from unknown causes.

5. That 1020 and Alzoubi have performed all conditions precedent required by the policy.

6. That Starr has breached the terms of said policy in that it has refused to pay the coverage provided by the policy and have denied 1020's claim.

7. That by reason of Starr's breach of said policy, 1020 and Alzoubi have sustained an actual cash value loss to the business property in the amount of Ninety-Seven Thousand, Ninety-Four Dollars (\$97,094.00) and have incurred costs for demolition removal in the amount of Nine-Thousand Dollars (\$9,000.00), loss of valuable papers in the amount of One-Thousand Dollars (\$1,000.00) and ongoing business income and expenses loss in the amount of Eight-Thousand Eight-Hundred and Eighty Dollars (\$8,880.00).

WHEREFORE, Plaintiffs, 1020 Food Market, Inc. and Muhammad Alzoubi, pray for Judgement against Defendant, Starr Indemnity & Liability, Company, for damages in the amount of One Hundred-Twenty-Five Thousand Nine Hundred and Seventy-Four Dollars (\$125,974.00) plus interest and all other just and proper relief in the premises.

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JURY DEMAND

Plaintiffs demand trial by jury on all Counts.

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